REMARKS

The Office Action mailed December 1, 2005 has been reviewed and

carefully considered. Claims 1-23 remain pending, the independent claims being 1, 3, 12

and 23. The independent claims are amended. Claim 21 is amended to cure an

informality in the manner suggested by the Examiner. Reconsideration of the above-

identified application, as amended and in view of the following remarks, is respectfully

requested.

Claim 21 stands objected to for reciting "the camera height" instead of "a

camera height," and is now amended in the manner the Examiner has suggested.

Claims 1-6, 8-17, 19-22 stand rejected under 35 U.S.C. 102(b) as

anticipated by U.S. Patent No. 5,699,444 to Palm.

Claim 1, as amended, recites:

A method for calibrating a camera of a camera-based image processing
system, the method comprising the steps of:
presenting via a graphical user interface a representation of an area in
which the camera is to be operated;
selecting at least one calibration point presented in the representation;
obtaining, responsively to said selecting, calibration information for each
selected point sequentially as the camera is pointed to corresponding
positions in the area, wherein, in case of more than one calibration point,
the pointing to any next one of said corresponding positions amounts to
rotating, in place, around a pan axis of the camera, a tilt axis of the camera
or both axes;
entering, for said each selected point, a command identifying a
corresponding position of the selected point within said representation;
and
computing at least one of position and orientation information for the
camera based on the obtained calibration information

Support for the amendment of claim 1 is found in the specification (e.g., page 9, lines 9-11).

Palm selects at least one calibration point, i.e., points A, B, C (col. 6, line 49), as the Office Action acknowledges (item 1, second paragraph; item 4).

However, the Office Action suggests that the Palm camera "must move to each calibration point" (item 1, second paragraph, last sentence).

The applicant traverses this suggestion by the Office Action.

Instead, the Palm camera is pointed (col. 7, line 28(29): "pointed"; col. 14, line 66: "pointed") at center point T. The center point T is the center point of an object of interest within an image embodied in an image capture medium, such as photographic film or digital array (col. 8, lines 34-35). In capturing the image, e.g., on film, the camera is pointed or aimed (col. 7, line 26: "aimed") at the center point T, and is not pointed elsewhere (col. 7, lines 26-30).

Palm is directed to "determining the location and orientation of . . . one or more cameras at the time" the "images were captured" (col. 5, lines 18(19)-20(21)). Thus, for example, two cameras located (col. 7, line 53: "location") at respective viewpoints f1 and f2 may capture an image of an object of interest (FIG. 1). Each of the cameras is aimed at a center point T at the time of image capture. The captured images are then subject to calculations (col. 8, line 37: "Calculating"). In particular, the three calibration points A, B, C (col. 4, line 57) in the captured image define a triangle with three interior angles. The analysis determines these angles (col. 8, line 47: "angles"). The triangle defines a viewing pyramid (col. 5, line 24: "viewing pyramid"). Based on the determined angles (equations 3-12 in columns 9 and 10), the pyramid defining

parameters are calculated (col. 10, line 41: "viewing pyramid is solved"). By subsequent

operations, e.g., modifying the pyramid (col. 5, line 25), the camera locations and

orientations are determined (col. 5, lines 18-24). More specifically, the orientation of any

given camera is a single orientation corresponding to where that camera was aimed (col.

7, line 26: "aimed") or pointed (col. 7, line 28: "pointed") at the time of image capture

(col. 8, line 34: "image capture"). That position where the camera was aimed is center

point T (col. 7, line 28).

At least since the Palm camera points at merely a single point T to capture

an image, the calibration points A, B, C in the captured image then being analyzed, Palm

fails to disclose or suggest "selecting at least one calibration point presented in the

representation; obtaining, responsively to said selecting, calibration information for each

selected point sequentially as the camera is pointed to corresponding positions in the area.

. ."

In addition, claim 1 is amended to recite, ". . . wherein, in case of more

than one calibration point, the pointing to any next one of said corresponding positions

amounts to rotating, in place, around a pan axis of the camera, a tilt axis of the camera or

both axes; . . ."

At least since the Palm camera points at merely a single point T (see, e.g.,

col. 7, line 28(29): "pointed"; col. 14, line 66: "pointed"), Palm fails to disclose or

suggest "pointing to any next one of said corresponding positions amounts to rotating, in

place. . ." which language explicitly appears in claim 1.

For at least the above reasons, Palm fails to anticipate the present

invention as recited in claim 1.

Reconsideration and withdrawal of the rejection is respectfully requested.

Moreover, since Palm methodology is based on pointing at merely a single common point T, it would not have been obvious to modify Palm to resemble the instant claim 1.

Claim 3 recites, ". . . obtaining calibration information <u>for each</u> of at least three calibration points <u>sequentially</u> as the camera is pointed to the <u>corresponding positions</u> in the area. . ."

Claim 12 recites, ". . . to obtain, responsively to said selecting, calibration information <u>for each</u> selected point <u>sequentially</u> as the camera is pointed to <u>corresponding positions</u> in the area. . ."

Claims 3 and 12 are additionally amended to recite, ". . . wherein, in case of more than one calibration point, the pointing to any <u>next</u> one of said corresponding positions <u>amounts to</u> rotating, in place, around a pan axis of the camera, a tilt axis of the camera or both axes; . . ."

Claims 3 and 12 are accordingly deemed to distinguish patentably over Palm for at least the reasons set forth above with regard to claim 1.

Reconsideration and withdrawal of the rejection is respectfully requested.

Claims 7, 18 and 23 stand rejected under 35 U.S.C. 103(a) as unpatentable over Palm.

Claims 7 and 18 depend from base claim 1, and have been shown to distinguish patentably over Palm at least due to their dependency.

Claim 23 recites, ". . . obtaining, responsively to said selecting, calibration information <u>for each</u> selected point <u>sequentially</u> as the camera is pointed to <u>corresponding positions</u> in the area. . ."

Claims 23 is additionally amended to recite, ". . . wherein, in case of more than one calibration point, the pointing to any <u>next</u> one of said corresponding positions <u>amounts to</u> rotating, in place, around a pan axis of the camera, a tilt axis of the camera or both axes; . . ."

Claim 23 is likewise deemed to distinguish patentably over Palm for at least the reasons set forth above with regard to claim 1.
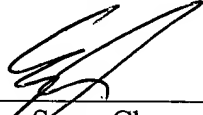
Reconsideration and withdrawal of the rejections is respectfully requested.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

Larry Liberchuk
Reg. No. 40,352

Date: January 4, 2006

By: Steve Cha
Attorney for Applicant
Registration No. 44,069

Mail all correspondence to:
Larry Liberchuk, Registration No. 40,352
US PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001
Phone: (914) 333-9608
Fax: (914) 332-0615